

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

COALITION FOR OPEN DEMOCRACY,
et al.,

Plaintiffs,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State, *et al.*,

Defendants.

Case No. 1:24-cv-00312-SE-TSM

AFFIDAVIT OF PATRICIA PIECUCH

I, Patricia Piecuch, being duly sworn on oath or affirmation, depose and state as follows:

Introduction

1. I am at least 18 years of age and I am competent to testify on the matters set forth herein. I have personal knowledge of the following facts, and if called as a witness, I can and will competently testify thereto.

2. I am not a party to this lawsuit, though I am employed by the Secretary of State, who is a defendant in this lawsuit in his official capacity.

3. I am the Elections Director in the New Hampshire Department of State. I have been employed in this position since September 30, 2019.

4. As the Election Director I manage the Elections Division, including, but not limited to the development and implementation of the new enhanced Statewide Voter Registration System (SVRS). The staff of the Division, IT staff, and I monitor daily and other periodic reports on activity within the SVRS for evidence of intrusion or misuse. I routinely present training to local election officials at regional, statewide, and on-line training meetings and oversee staff who prepare and present training for local election officials on both the conduct

of voter registration and elections and the proper use of the SVRS. I manage the Elections Division help desk that responds to phone calls and emails from local election officials and the public regarding voter registration, the conduct of elections, and use of the SVRS.

5. I submit this affidavit in support of Defendants' Amended Objection to Plaintiffs' Motion to Compel the Statewide Voter Database & Related Documents (ECF No. 60) ("Defendants' Amended Objection").

Statewide Voter Registration System

6. New Hampshire's Statewide Voter Registration ("SVRS") is a database and communications system accessed by local election officials throughout the state. Local election officials, supervisors of the checklist and clerks, enter and update the data in SVRS. Each can access the data on the voters in their own town or city and cannot run reports related to jurisdictions outside their own. They have access to data on voters registered in other towns or cities only when managing the transfer of a voter's registration from one town/city to another town/city. RSA 654:45, III (2)(c).

7. New Hampshire's SVRS is required by federal law. Federal law mandates that state officials guarantee the integrity of the system and the confidentiality of the data maintained in the database.

8. Defendants' Amended Objection accurately states the SVRS' purpose, usage, and function. It also accurately states the general nature of SVRS data as a repository of confidential personal information of registered voters.

I hereby declare under the penalty of perjury that the foregoing testimony supporting Defendants' Amended Objection to Plaintiffs' Motion to Compel the Statewide Voter Database & Related Documents (ECF No. 60) in the case of *Coalition for Open Democracy, et al. v.*

Scanlan, et al., Docket No. 1:24-cv-312-SE-TSM, is true and accurate to the best of my knowledge and belief.

Dated: April 28, 2025

Patricia Piecuch

Patricia Piecuch
Elections Director
N.H. Department of State

THE STATE OF NEW HAMPSHIRE

COUNTY OF Merrimack

Personally appeared before me, Patricia Piecuch, and acknowledged the foregoing to be true and accurate to the best of his knowledge and belief.

Dated: April 28, 2025

Kristin Martino

Notary Public / Justice of the Peace

